

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1 and JANE DOE 2, on behalf of
themselves and all similarly situated women,

Plaintiffs,

-against-

THE CITY OF NEW YORK and BENNY
SANTIAGO,

Defendants.

15 Civ. 3849 (AKH)

**NOTICE OF PLAINTIFFS' MOTION TO COMPEL THE CITY TO PRODUCE
DOCUMENTS AND RESPOND TO INTERROGATORIES**

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Plaintiffs' Motion to Compel the City to Produce Documents and Respond to Interrogatories, and the Declaration of Josh E. Anderson, dated June 7, 2016 (the "Anderson Declaration"), and all attached exhibits, plaintiffs Jane Doe 1 and Jane Doe 2 ("Plaintiffs") will move this Court, at a date and time to be determined by the Court, pursuant to Federal Rule of Civil Procedure 37, for an order compelling the production of documents and responses to interrogatories, and for such other relief as this Court deems just and proper; and

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1, unless the Court orders otherwise, opposition papers are due seven days after service of the moving papers, and reply papers two days after service of the opposition papers.

Plaintiffs submit the following exhibits to the Anderson Declaration:

Ex. 1	Plaintiffs' Second Set of Requests for Production of Documents to Defendant the City of New York Relating to Merits Discovery, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. Mar. 21, 2016)
Ex. 2	Defendant's Responses and Objections to Plaintiffs' Second Set of Document Requests, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. May 2, 2016)
Ex. 3	Plaintiffs' Fourth Set of Requests for Production of Documents to Defendant the City of New York Relating to Merits Discovery, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. Apr. 29, 2016)
Ex. 4	Plaintiffs' Fourth Set of Interrogatories to Defendant the City of New York, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. Apr. 29, 2016)
Ex. 5	Defendant's Responses and Objections to Plaintiffs' Fourth Set of Document Requests, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. June 2, 2016)
Ex. 6	Defendant's Responses and Objections to Plaintiffs' Fourth Set of Interrogatories, <i>Jane Doe 1 v. City of New York</i> , No. 15 Civ. 3849 (AKH) (S.D.N.Y. June 2, 2016)

Dated: New York, New York
June 7, 2016

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: James L. Bromley/TMK
James L. Bromley
jbromley@cgsh.com

One Liberty Plaza
New York, New York 10006
Tel: (212) 225-2000
Fax: (212) 225-3999

Of Counsel:
Mitchell A. Lowenthal
mloenthal@cgsh.com
Josh E. Anderson
jeanderson@cgsh.com
Danielle P. Mindlin
dmindlin@cgsh.com

William D. Gibney
wdgibney@legal-aid.org
Marlen S. Bodden
mbodden@legal-aid.org
Barbara P. Hamilton
bphamilton@legal-aid.org
THE LEGAL AID SOCIETY
199 Water Street, 6th Floor
New York, New York 10038
Tel: (212) 577-3300

Attorneys for Plaintiffs